

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

ESSENCE JACKSON,

Plaintiff,

v.

SHELL CHEMICAL LP,

Defendant.

CIVIL ACTION NO. 22-004478-CG-N

**DEFENDANT’S MOTION TO DISMISS OR, IN THE ALTERNATIVE, FOR A  
MORE DEFINITE STATEMENT**

Defendant Shell Chemical LP hereby moves to dismiss without prejudice all claims in Plaintiff’s Complaint pursuant to Fed. R. Civ. P. 12(b)(6). Or, in the alternative, for a more definite statement pursuant to Rule 12(e). This motion is based upon the memoranda of law filed pursuant to S.D. Ala. CivLR 7, and all of the files, records and proceedings herein.

Respectfully submitted,

Date: May 1, 2023

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